

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ANADARKO PETROLEUM
CORPORATION SECURITIES
LITIGATION

§ Civil Action No. 4:20-cv-00576
§ The Honorable Charles R. Eskridge III
§ CLASS ACTION
§ Magistrate Judge Christina A. Bryan

JOINT ADVISORY REGARDING PARTIES' MEET AND CONFER

Pursuant to the Court’s March 19, 2024 Order (ECF 224), the Parties¹ respectfully submit this joint Advisory regarding the results of their meet and confer concerning Defendants’ April 12, 2024 log of challenged documents (“April 12 Log”).

WHEREAS, on March 19, 2024, the Court held a telephonic status conference regarding the procedures and schedule to be employed in the Court’s review of documents that Defendants challenge as falling outside “the scope of the privilege and work-product waiver that Judge Eskridge found with respect to the entire subject matter of the investigation conducted by the Anadarko Audit Committee” (the “Challenged Documents”) (ECF 220 at 1; ECF 223);

WHEREAS, that same day, the Court ordered that, “by April 12, 2024, the Defendant shall produce an updated privilege log containing additional information regarding the type and subject matter of the challenged documents” (ECF 224 at 2);

WHEREAS, the Court’s Order also required the Parties to “meet and confer by April 19, 2024 to discuss any disputes regarding the sufficiency of the descriptions provided in the updated privilege log” and to “file an Advisory to the Court regarding the results of the meet and confer and inform the Court whether a conference is needed to resolve any disputes regarding the privilege log” (*id.*);

¹ The “Parties” refer to Class Representatives Norfolk County Council as Administering Authority of the Norfolk Pension Fund and Iron Workers Local #580 Joint Funds, on behalf of themselves and the Class (collectively, “Plaintiffs”), and defendants Anadarko Petroleum Corporation, R.A. Walker, Robert G. Gwin, Robert P. Daniels, and Ernest A. Leyendecker, III (collectively, “Defendants”).

WHEREAS, on April 12, 2024, Defendants served on Class Counsel a log of 382 “Documents Subject to Motion to Compel Order” containing log entries for all the Challenged Documents;

WHEREAS, on April 16, 2024, the Parties met and conferred for over an hour about the sufficiency of the descriptions and other information provided in Defendants’ April 12 Log; and

WHEREAS, while the Parties were unable to resolve all their disputes regarding the April 12 Log’s sufficiency, they agreed to continue discussing these issues as part of their upcoming Challenged Documents conferral (due April 26, 2024) and the letter briefing to follow, reserving their rights regarding the sufficiency or insufficiency of the April 12 Log.

THEREFOR, the Parties do not believe further conference is necessary at this time, and will proceed as proposed above, unless directed otherwise.

DATED: April 19, 2024

Respectfully submitted,

KENDALL LAW GROUP, PLLC
JOE KENDALL (Texas Bar No. 11260700)
(SDTX Bar No. 30973)
Attorney-in-charge

s/ Joe Kendall
JOE KENDALL

3811 Turtle Creek Blvd., Suite 825
Dallas, TX 75219
Telephone: 214/744-3000
214/744-3015 (fax)

Texas Local Counsel for Plaintiff

ROBBINS GELLER RUDMAN & DOWD LLP
MARK SOLOMON
DANIEL S. DROSMAN
RACHEL L. JENSEN
LUKE O. BROOKS
HILLARY B. STAKEM
FRANCISCO J. MEJIA
MEGAN A. ROSSI
NICOLE Q. GILLILAND
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Class Counsel

DATED: April 19, 2024

SHIPLEY SNELL MONTGOMERY LLP
GEORGE T. SHIPLEY (TX Bar No. 18267100)
(SDTX Bar No. 02118)

s/ George T. Shipley
GEORGE T. SHIPLEY

717 Texas Avenue, Suite 1800
Houston, TX 77002
Telephone: 713/652-5920
713/652-3057 (fax)

CRAVATH, SWAINE & MOORE LLP
KEVIN J. ORSINI (*pro hac vice*)
LAUREN M. ROSENBERG (*pro hac vice*)
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
Telephone: 212/474-1000
212/474-3700 (fax)

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on all counsel of record who have appeared in this matter via the Court's CM/ECF system on this, the 19th day of April, 2024.

s/ Joe Kendall

JOE KENDALL